

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY AVERAGE WHOLESALE PRICE LITIGATION)	MDL NO. 1456
)	
)	CIVIL ACTION NO. 01-CV-12257-PBS
)	
THIS DOCUMENTS RELATES TO ALL CLASS ACTIONS)	Judge Patti B. Saris
)	
)	

**DEFENDANT-SPECIFIC REPLY MEMORANDA IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS THE AMENDED
MASTER CONSOLIDATED CLASS ACTION COMPLAINT**

The following defendants submit the attached Defendant-Specific Reply Memoranda in Support of the Motion to Dismiss: Abbott Laboratories; Amgen Inc.; AstraZeneca Pharmaceuticals LP; Aventis Pharmaceutical Inc. and Hoechst Marion Roussel, Inc.; Baxter Healthcare Corporation and Baxter International Inc.; Bayer Corporation; Boehringer Ingelheim Corporation, Ben Venue Laboratories, Inc., and Bedford Laboratories; B. Braun of America Inc.; Bristol-Myers Squibb Company; Dey, Inc.; Fujisawa Health Care, Inc. and Fujisawa USA, Inc.; GlaxoSmithKline; Hoffman-La Roche Inc.; Immunex Corporation; Novartis Pharmaceuticals Corporation; Pfizer Inc.; Pharmacia Corporation and Pharmacia & Upjohn, Inc.; Sicor Inc. and Sicor Pharmaceuticals, Inc.; and TAP Pharmaceuticals Product, Inc.

Dated: September 30, 2003

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Counsel for defendants hereby certify that they have conferred with plaintiffs in a good faith attempt to narrow or resolve the issues presented by these memoranda.

ASTRAZENECA PHARMACEUTICALS, LP
ON BEHALF OF ALL DEFENDANTS

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Dated: September 30, 2003

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on September 30, 2003, a copy to Verilaw Technologies for posting and notification to all parties.

Lucy Fowler
Lucy Fowler

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